

Initial Notification/Compliance Certification
For Paint Stripping and Miscellaneous Surface Coating Operations
Area Source Rule
40 CFR Part 63, Subpart HHHHHH (Parts 63.11169 – 63.11180)

INSTRUCTIONS

1. Who Must Complete This Form?

On January 9, 2008, the U.S. Environmental Protection Agency (USEPA) promulgated federal regulations codified in 40 CFR Part 63, Subpart HHHHHH to reduce air emissions from the following area sources:

- Paint stripping using methylene chloride (MeCl).
- Surface coating of motor vehicles and mobile equipment.
- Surface coating of miscellaneous metal and/or plastic parts.

Specific operations are exempt from the regulation as described in Section 6 below.

If the area source conducts any one of the operations listed above, and does not meet the exemption criteria in Section 6, then this form must be completed and submitted to USEPA at the address listed in Section 5.

However, the regulation allows for the owner or operator of motor vehicle or mobile equipment surface coating operations to petition the USEPA for an exemption from the regulation if it can be demonstrated that the coatings that are spray applied do not contain the target hazardous air pollutants, as defined in Section 2.

The "Petition for Exemption" form can be obtained from the MDEQ, Environmental Assistance Program by calling (800) 662-9278, or go to their Web site at www.michigan.gov/deqenvassistance. Select "Clean Air Assistance" under "Related Links," and then select "Paint Stripping & Miscellaneous Surface Coating Operations at Area Sources" under "Federal Regulations."

2. Definitions

Area source – any stationary source of hazardous air pollutants (HAP) that is not a major source.

Existing source – an area source that was engaged in surface coating and/or paint stripping on or before September 17, 2007 or the source began the installation of the surface coating and/or paint stripping equipment on or before this date.

Major source – any stationary source or group of stationary sources located within a contiguous area and under common control that emits, or has the potential to emit, considering controls, 10 tons per year (tpy) or more of any single HAP, or 25 tpy or more of any combination of HAP.

New source – an area source whose initial startup of the surface coating and/or paint stripping operation occurred after September 17, 2007.

Paint stripping operations – those operations that perform paint stripping using methylene chloride (MeCl) for the removal of dried paint (including but not limited to paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates at area sources, where paint stripping is either the principal activity, or an incidental activity at the source.

Surface coating of miscellaneous metal and/or plastic parts – those operations that involve spray application of coatings that contain the target HAP compounds of chromium, lead, manganese, nickel, or cadmium to miscellaneous parts and products made of metal or plastic, or combination of metal or plastic that are not motor vehicles or mobile equipment.

Surface Coating of motor vehicles and mobile equipment – those operations that involve spray application of coatings at area sources to automobiles, light trucks, heavy duty trucks, buses, construction equipment, self-propelled vehicles and equipment that may be drawn and/or driven on a roadway.

Target Hazardous Air Pollutants (HAP) – compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

3. What Sections of the Form Must Be Completed?

This form is a combined form that can be used to satisfy the following three requirements:

1. Initial Notification (Part A of form)
2. Compliance Certification (Part B of form)
3. Annual Notification of Changes (portions of Parts A and B)

New area sources must complete both Part A and Part B by the compliance date specified in Section 4 below, provided that they are in compliance with the regulation. Please refer to the definition of “new source” in Section 2 above.

Existing area sources must complete Part A by the specified compliance date, and can complete Part B at the later date specified in Section 4. However, if the source is in compliance with the regulation, Parts A and B can be completed to satisfy both the Initial Notification and the Compliance Certification requirements. Please refer to the definition of “existing source” in Section 2 above.

Part B – Compliance Certification

Parts B.1 and B.2. requires the area source to indicate its compliance status with the regulations. Part B.3 is required if the area source is making an Annual Notification of Changes. Part B.4 requires a certifying official to attest to the compliance status of the area source.

Annual Notification of Changes

You are required to submit the annual notification of changes report on or before March 1 of each calendar year if:

- Initial Notification or Notification of Compliance form previously submitted contained information that has since changed within the previous calendar year, or
- Deviations from the regulatory requirements, as specified in §63.11173(a) through (d) or §63.1173(e) through (g), occurred during the previous calendar year.
- Information on MeCl use. This includes actually using more than 1 ton per year (tpy) MeCl in a calendar year but you declared on a previous Initial Notification form that less than 1 tpy was used. (If this is the case, then you are subject to develop and implement a written MeCl Minimization Plan, and must achieve compliance with this requirement by December 31 of the year in which the Annual Notification of Changes report was submitted to USEPA.)

If you are using this form to satisfy the Annual Notification of Changes reporting requirement, you must complete the following sections:

- Parts A.1, A.2, and A.3, and
- Parts B.1, B.2, B.3, and B.4.

4. When Must This Form Be Submitted?

The following table explains the type of notification form required by the regulations and the date of achieving compliance (compliance date) with the regulations. The compliance date depends on whether you are a new or existing area source, and also establishes the date for submitting the required notification forms to USEPA Region 5.

Type of Notification and Compliance Dates		
Source Type	Initial Notification (Part A of form)	Compliance Certification (Part B of form)
New Source	Must submit within 180 days after start up or by July 7, 2008 (whichever date is later)	Must certify compliance with the regulation simultaneously with the Initial Notification and submit within 180 days after start up or by July 7, 2008 (whichever date is later)
Existing Source	Must submit no later than January 11, 2010	Must submit no later than March 11, 2011

5. Where Do I Send The Completed Form?

Please make a copy of this form and submit the original signed copy by U.S. mail, or by another courier, to the USEPA Region 5 Office at the following address:

Compliance Tracker (AE-17J)
77 West Jackson Blvd.
Chicago, IL 60604

It is recommended that the form be sent by registered mail.

6. Who Is Exempt from the Regulation?

The regulations do not apply to the following activities:

1. Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.
2. Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.
3. Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. However, an individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the regulation pertaining to motor vehicles and mobile equipment regardless of whether compensation is received.
4. Surface coating or paint stripping that meets the definition of "research and laboratory activities" in §63.11180.
5. Surface coating or paint stripping that meets the definition of "quality control activities" in §63.11180.
6. Surface coating or paint stripping activities that are covered under another area source National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation.



Initial Notification/Compliance Certification For Paint Stripping and Miscellaneous Surface Coating Operations

Area Source Rule

40 CFR Part 63, Subpart HHHHHH (Parts 63.11169 – 63.11180)

Please review the Instruction Sheet before completing this form. Please print or type all information.

Identify the Type of Notification Being Made *(please check all that apply)*

☐ Initial Notification ☐ Compliance Certification ☐ Annual Change Notification

PART A – Initial Notification

A.1 Company Information

Company Name: _____

Mailing Address: _____ Telephone Number: _____

Fax Number: _____

City: _____ State: _____ Zip: _____

Please check whether the area source is a new or existing source: ☐ New Source ☐ Existing Source
(refer to Instruction Sheet definitions)

A.2 Owner/Operator Information

Name: _____

Mailing Address: _____ Telephone Number: _____

E-mail: _____

City: _____ State: _____ Zip: _____

Please check whether the person listed above is the owner or operator of the area source: ☐ Owner ☐ Operator

A.3 Facility Location Information (If different from Company Information)

Company Name: _____

Street Address: _____ County: _____

City: _____ State: _____ Zip: _____

Is the source a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location? ☐ Yes ☐ No

A.4 Identification of Regulatory Standard

I understand that I am subject to 40 CFR Part 63 Subpart HHHHHH, National Emissions Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

Please initial here: _____

A.5. Surface Coating Operations		Enter number of each		
		spray booths	prep stations	painters
<input type="checkbox"/> Yes <input type="checkbox"/> No	Do you surface coat motor vehicles or mobile equipment?			
<input type="checkbox"/> Yes <input type="checkbox"/> No	Do you surface coat plastic and/or metal parts with paints containing cadmium, chromium, lead, manganese, and nickel?			

A.6. Paint Stripping Operations	
<input type="checkbox"/> Yes <input type="checkbox"/> No	Do you use paint strippers containing Methylene Chloride (MeCL)? Go to Part B if you answer "No."
<p>Methods of paint stripping employed (check all that apply)</p> <p><input type="checkbox"/> Chemical <input type="checkbox"/> Mechanical <input type="checkbox"/> Other (please describe):</p> <p>Substrates stripped (check all that apply)</p> <p><input type="checkbox"/> Wood <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Other (please describe):</p>	
<input type="checkbox"/> Yes <input type="checkbox"/> No	Do you/will you use more than 1 ton of MeCL annually?

PART B – Compliance Certification

B.1. Compliance Certification for Methylene Chloride (MeCL) Paint Stripping

Do you use paint strippers containing MeCL? ☐ Yes ☐ No
 (Go to Part B.2 if you answer "No")

The relevant requirements are listed below:

- Evaluate each application to ensure there is a need for paint stripping. [§63.11173(a)(1)]
- Evaluate each MeCL paint stripping operation to ensure there is no alternative technology that can be used. [§63.11173(a)(2)]
- Reduce exposure of paint strippers containing MeCL to the air. [§63.11173(a)(3)]
- Optimize applications conditions to reduce evaporation. [§63.11173(a)(4)]
- Practice proper storage and disposal of paint strippers. [§63.11173(a)(5)]

If you use more than 1 ton of MeCL annually, you must do the following:

- Implement the requirements above. [§63.11173(b)]
- Maintain copies of annual usage of paint strippers containing MeCL on site at all times. [§63.11173(c)]
- Develop and implement a written MeCL minimization plan. The plan must be kept onsite. [§63.11173(b) and (d)]

- Post a placard or sign outlining the MeCL minimization plan in each area where the paint stripping occurs. [§63.11175(b)]

Please Check One

- a. ☐ The source is currently in compliance with each of the above requirements.
- b. ☐ The source will be in compliance with the above requirements by the compliance date (see table below).
- c. ☐ The source is currently not in compliance with the above requirements.

Source Type	Compliance Date
New Source (startup after 1/9/08)	Date of Startup
New Source (startup after 9/17/07 but on or before 1/9/08)	1/9/08
Existing Source (startup on or before 9/17/07)	1/10/11

B.2. Compliance Certification for Surface Coating

Are you subject to the surface coating provisions of 40 CFR Part 63, Subpart HHHHHH? ☐ Yes ☐ No
(Go to Part B.3 if you answer "No")

The relevant requirements are listed below:

- Spray-applied coatings are to be applied in a preparation station or spray booth and meet the requirements found in §63.11173(e)(2).
- All spray applied coatings are to be applied with high volume low pressure (HVLP) electrostatic, air-assisted airless application or equivalent technology. [§63.11173(e)(3)]
- Train and certify all spray equipment operators in proper application of surface coatings. [§63.11173(e)(1)]

Please Check One

- d. ☐ The source is currently in compliance with each of the above requirements.
- e. ☐ The source will be in compliance with the above requirements by the compliance date (see table below).
- f. ☐ The source is currently not in compliance with the above requirements.

Source Type	Compliance Date
New Source (startup after 1/9/08)	Date of Startup
New Source (startup after 9/17/07 but on or before 1/9/08)	1/9/08
Existing Source (startup on or before 9/17/07)	1/10/11

B.3. Change in Compliance Status

If you check box B.1.c and/or B.2.f above, please provide an explanation below of the noncompliance and describe corrective actions being taken to achieve compliance (*attach a separate sheet if necessary*).

B.4. Compliance Verification Statement

I certify the truth, accuracy, and completeness of this notification. The source has complied with all the relevant standards of this subpart. This initial notification also serves the notification of compliance status.

Certifying Official: ☐ Owner ☐ Operator (check one)

Name of Certifying Official (print or type)

Title

Signature of "Certifying Official"

Date

Please make a copy of this Initial Notification and Compliance Certification and submit the original signed copy by U.S. mail, or by another courier, to the U.S. Environmental Protection Agency (USEPA) Region 5 office at the following address:

Compliance Tracker (AE-17J)
77 West Jackson Blvd.
Chicago, IL 60604